

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:)	
)	Civil Action No. 4:25-cv-01584
STEWARD HEALTH CARE SYSTEM,)	
LLC, <i>at al.</i> ,)	Bankruptcy Case No. 24-90213
Debtors. ¹)	

**UNOPPOSED MOTION FOR THE COURT’S ACCEPTANCE OF SEALED
DOCUMENTS UNDER BANKRUPTCY RULE 8009(f)**

Appellants Dr. Manisha Purohit, Dr. Diane Paggioli, Dr. James Thomas, Dr. Thomas Ross, Dr. Michael Regan, Dr. Peter Lydon, Dr. Sridhar Ganda, Dr. A. Ana Beesen, Dr. Benoy Zachariah, Dr. Barry Arkin, Dr. Bruce Kriegel, and Dr. Gary Miller (“**Appellants**”) file their Unopposed Motion for the Court’s Acceptance of Sealed Documents under Bankruptcy Rule 8009(f) (“**Motion**”) and respectfully show the following:

This appeal involves documents and evidence filed under seal with the Bankruptcy Court, which have been designated as part of the record on appeal. Bankruptcy Rule of Procedure 8009(f) provides that

Sealed Documents.

(1) *In General*. A document placed under seal by the bankruptcy court may be designated as a part of the record on appeal. But a document so designated:

¹ A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://restructuring.ra.kroll.com/Steward>. The Debtors’ service address for these chapter 11 cases is 1900 N. Pearl Street, Suite 2400, Dallas, Texas 75201.

(A) must be identified without revealing confidential or secret information; and

(B) may be sent only as (2) prescribes.

(2) *When to Send a Sealed Document*. To have a sealed document sent as part of the record, a party must file in the court where the appeal is pending a motion to accept the document under seal. If the motion is granted, the movant must notify the bankruptcy court, and the bankruptcy clerk must promptly send the sealed document to the clerk of the court where the appeal is pending.

When Appellants' file their opening brief they will do so with an appendix that complies with Bankruptcy Rule 8009(f)(1)(A), above. In order that the Court can receive the sealed documents, Appellants request that the Court enter an order consistent with Rule 8009(f)(2). The parties have conferred, and Appellees do not oppose the relief requested in this Motion.

Conclusion

For the reasons stated above, Appellants respectfully request that the Court grant this Motion and enter an order consistent with Bankruptcy Rule 8009(f)(2) that provides for the Court's acceptance of sealed portions of the designated record.

Dated: June 26, 2025

DIAMOND MCCARTHY, LLP

By: /s/ Christopher D. Johnson

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Counsel for the Appellants

CERTIFICATE OF CONFERENCE

I hereby certify that on June 26, 2025, I communicated by email with Clifford Carlson, counsel for the Debtors, regarding the relief requested in the foregoing Motion. Mr. Carlson informed me that they do not oppose the Motion.

/s/ Christopher D. Johnson

CERTIFICATE OF SERVICE

I hereby certify that on June 26, 2025, I caused the foregoing pleading to be filed and it was served by the Court's electronic noticing service to all parties registered to receive ECF notice.

/s/ Christopher D. Johnson